

Before the Federal Communications Commission
Washington, DC 20554

In the matter of:

WT Docket 96-86

Development of Operational, Technical and Spectrum
requirements for meeting Federal, State and Local Public Safety
Communications requirements through the year 2010

WT Docket 06-150

Service rules for the 698-746, 747-762 and 777-792 MHz Bands

WT Docket 06-169

Former Nextel upper 700 MHz Guard Band licenses and
revisions to FCC Part 27

PS Docket 06-229

Implementing a nationwide, broadband, interoperable public
safety network in the 700 MHz band

Comments of David Cook, President Allcomm Technologies, Inc.

After carefully reviewing the data and voice options available to public safety, I do not understand the need to establish another nationwide carrier. The complaint heard from Public Safety is not of price or data speed but of coverage. Today's carriers offer high-speed data at a reasonable rate. The competition has created a great opportunity for carriers who offer these added options. The problem is that no carrier today meets the public safety requirement for interior coverage or coverage in remote areas. In fact there are no requirement for this coverage from a nationwide 700 MHz system. It seems that we are willing to give away a complete band of channels to an upstart vendor with no guarantees. Why waste the band? Is a nationwide vendor going to create new towers in remote areas where return on investment is low? Is a nationwide vendor going to add coverage inside buildings by creating their system for the once in a lifetime need? There is no return on investment for saving or protecting a life! The burden of responsibility for Police, Fire, First Aid and Emergency Management is squarely placed on the local government but the resources to accomplish their job will not be under their control.

So how do we serve the local jurisdiction? They will not be saving money by creating duplicate systems to cover the remote locations and

other required areas of concern. Under the current notices, we will see a nice nationwide system that mirrors today's cellular systems with the same limitations except that Public Safety has priority during emergencies. Priority is of little concern when coverage is poor. I guess that means that an officer would be the first in line if he/she could reach the system. We need to leave the resources in the hands of the responsible parties, the local, county and state governments

I believe that the 700 MHz bands should not be squandered by trying to create another nationwide system. The FCC has done a good job in establishing multiple vendors who offer diverse services throughout the country. These vendors have significant investments in data and voice service and have been given plenty of available resources in the form of frequency band. Anyone in a populated area has access to these services. The unpopulated areas have no guarantees even with the new proposal. So what are we accomplishing? With no guarantees, a newly formed upstart carrier receives a free unencumbered bandplan. With these channels, the upstart will look to collocate antennas on the existing cellular towers where they will offer comparable service to the existing cellular providers. They will offer this service to public safety and to the public in general with priority caveats. Public Safety will purchase the service that best fits their needs from one of the suppliers. They will choose the vendor that provides good coverage and speed or if they cannot find the coverage and speed they require, they will build it themselves. The public demands service to the smallest and most vulnerable citizen no matter where they live and the jurisdiction must provide for this need. We cannot limit the resources available for this requirement by giving channels away or by limited the usage of the channels.

Please open the 700 MHz bandplan to the local governments to create the systems they require.

Respectfully Submitted,
David Cook
President, Allcomm Technologies, Inc.
May 23, 2007